

Narrative Accompanying Both the July 2005 and October 2005 Final Device Edit Files

CMS is requesting that hospitals and other interested parties review and provide comments on the final device code edits that will be implemented in July and/or October 2005. Comments should be directed to OUTPATIENTPPS@cms.hhs.gov. Comments should be submitted on or before February 20, 2005. In particular, commenters should advise us of device codes other than those identified that may appropriately be billed with the HCPCS procedure codes identified for the edit. Commenters should also advise whether we should implement these edits in stages, as proposed, or whether we should implement them all in July. We are seeking the implementation schedule that is least burdensome for hospitals.

In the November 15, 2004 final rule, which announced the 2005 OPPS, we announced that we would implement some device code edits in April, 2005 and provided them for public comment. We have reviewed the comments and the revised edits are posted under supplemental information on the 2005 OPPS webpage. In the final rule, we also indicated that we would propose and provide an opportunity for public comment on the device edits for the remaining device dependent APCs. This is that opportunity for comment. These edits are intended to ensure that services contained in device dependent APCs are properly coded on claims that CMS will use to set the payment amounts for these APCs.